

**YOUNG  
CONAWAY**

**WILMINGTON  
RODNEY SQUARE**

**NEW YORK  
ROCKEFELLER CENTER**

**CHARLOTTE  
CARILLON TOWER**

**Pilar G. Kraman**  
P 302.576.3586  
pkraman@ycst.com

[REDACTED]

July 8, 2025

**VIA CM/ECF & HAND DELIVERY**

REDACTED - PUBLIC VERSION

Filed: July 15, 2025

The Honorable Gregory B. Williams  
United States District Court  
for the District of Delaware  
844 N. King Street  
Wilmington, DE 19801

Re: *Biogen, Inc. v. Zydus Worldwide DMCC, et al.*  
C.A. No. 23-732-GBW

Dear Judge Williams:

I write on behalf of Defendants Zydus Worldwide DMCC, Zydus Pharmaceuticals (USA) Inc., and Zydus Lifesciences Limited (collectively, "Zydus") regarding the Court's June 27, 2025, Oral Order requesting the parties to file a joint status report regarding the need for trial and a new trial date. D.I. 77. Plaintiffs opposed including in the report the status of the Parties' settlement negotiations so Zydus writes separately to provide that information.

[REDACTED]

To that end, Zydus respectfully requests the Court enter an Order that requires the Parties:

- (1) to provide a status report on the state of current negotiations by August 1, 2025;
- (2) if no settlement has been reached by August 1, 2025 to submit within twenty-one (21) days a report identifying either: (a) an agreed mediator, or (b) one individual identified by Plaintiffs and one individual identified by Zydus from which the Court may select a mediator; and

Young Conaway Stargatt & Taylor, LLP  
Page 2

(3) to conduct in-person mediation, including attendance of party representatives with full authority to settle, within thirty (30) days of the Court appointing a mediator.

Counsel for Zydus are available at the Court's convenience should the Court have any questions.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "P. Kraman", with a stylized initial "P" and a cursive "Kraman".

Pilar G. Kraman (No. 5199)